

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

United States of America)	
)	
v.)	USDC No. 21-cr-748 (JEB)
)	
William D. Merry, Jr.,)	
<i>defendant.</i>)	

UNOPPOSED MOTION TO MODIFY JUDGMENT

The defendant, through undersigned counsel, Nathan I. Silver, Esq., appointed by this Court under the Criminal Justice Act, respectfully moves the Court, without opposition from the United States, to modify the Judgment in a Criminal Case, (ECF Doc. 49, filed April 11, 2022) as follows:

The Court, at the request of the defendant, recommended to the U.S. Bureau of Prisons that the defendant serve his sentence (45 days incarceration) “in a facility close to the defendant’s home.” (Doc. 49, page 2) The defendant learned through counsel, who followed on the public line the sentencing of Emily Hernandez, of the St. Louis City Justice Center (“Center”) , which Ms. Hernandez, through her lawyer, Michelle Peterson, Esq., requested for the service of Ms. Hernandez’s sentence. The Center’s website describes it as a “state of the art facility” which opened in 2002. Given the defendant’s medical needs, it is hoped that this facility will be able to provide proper and complete medical care. The government does not oppose this motion.

A proposed Order is attached.

WHEREFORE, the defendant respectfully moves the Court to grant said relief.

– end of text –

This pleading is,

Respectfully submitted,

/s/

NATHAN I. SILVER, II
Unified Bar #944314
6300 Orchid Drive
Bethesda, MD 20817
(301) 229-0189 (direct)
(301) 229-3625 (fax)
email: nisquire@aol.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing pleading has been served via ECF on Jessica Arco, Esq., trial attorney and detailee, U.S. Attorney for the District of Columbia, this 12th day of April, 2022.

/s/

Nathan I. Silver, II